

**IN THE UNITED STATE DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	
	:	
<b>v.</b>	:	<b>CRIM NO. 20-254</b>
	:	
<b>ZHENYU WANG</b>	:	
<b>DANIEL RAY LANE</b>	:	

**SUPPLEMENTAL NOTICE OF EXPERT WITNESS**

The defendants in the above-captioned matter, Zhenyu Wang and Daniel Ray Lane (“Defendants”), through undersigned counsel, in reference to the Notice of Expert Witness filed on November 5, 2023 in the above-captioned matter (ECF 445), file this Supplemental Notice of Expert Witness.

On November 5, 2023, Defendants filed a Notice of Expert Witness in the above-captioned matter pursuant to Federal Rule of Criminal Procedure 16(b)(1)(C). Via said Notice, Defendants indicated their intent to call Perry S. Bechky, Esquire, to testify as an expert on trade sanctions imposed by the United States with respect to the Russian Federation and Iran. In supplement to the initial Notice, Defendants will elicit the following opinions from Attorney Bechky:

- That in 2019-2020, transactions by U.S. persons involving crude oil originating from Russia, or Russian companies or individuals, were not necessarily violative of U.S. sanctions laws such as the International Emergency Economic Powers Act (IEEPA). Rather, such a transaction would only be unlawful under U.S. sanctions laws at that time if it involved individuals or entities included in, or entities 50% or more owned by individual or entities included in, (i) the List of Specially Designated Nationals and Blocked Persons (the SDN List); or, in certain circumstances (ii) the Sectoral Sanctions

Identifications List (the SSI List). The SDN List and the SSI List are maintained by OFAC and identify individuals and entities subject to different types of U.S. sanctions.

- With respect to companies at issue in the above-captioned case—specifically, Gazprom and Vopak:
  - in 2019-2020, it was not a violation of IEEPA for U.S. persons to engage in import or export crude oil transactions with Vopak, a publicly-traded Dutch company, unless Vopak was 50% or more owned by sanctioned persons, which appears to be inconsistent with publicly available information about Vopak; and
  - in 2019-2020, it was not a violation of IEEPA for U.S. persons to engage in import or export crude oil transactions with Gazprom, unless such transactions involved support for certain deepwater, Arctic offshore, or shale projects involving exploration or production of oil.
- The bases and reasons for Attorney Bechky's anticipated testimony include IEEPA, OFAC's SDN and SSI Lists, executive orders, and OFAC regulations and directives pertaining to U.S. sanctions imposed on Russia, Russian oil and gas transactions, and Russian individuals and companies, including Executive Order 13662 and OFAC's Directive 4 pursuant thereto.
- Attorney Bechky will further compare U.S. sanctions regimes governing transactions involving Russian crude oil or Russian individuals and entities in 2019-2020 to sanctions governing transactions involving Iranian crude oil or Iranian individuals and entities during this same period. The bases and reasons for Attorney Bechky's anticipated testimony regarding these matters include IEEPA, executive orders, and OFAC regulations pertaining

to U.S. sanctions imposed on Iran, including the Iranian Transactions and Sanctions Regulations, 31 C.F.R. Part 560.

/s/ Perry S. Bechky, Esquire

Perry S. Bechky, Esquire

Pursuant to Fed.R.Crim.P. Rule 16(b)(1)(C)(v), on November 5, 2023, I approve of the foregoing disclosure.

Respectfully submitted,

/s/ Mark E. Cedrone, Esquire

Mark E. Cedrone, Esquire

Attorney for Zhenyu Wang

/s/ Paul J. Hetznecker, Esquire

Paul J. Hetznecker, Esquire

Attorney for Daniel Ray Lane

Date: November 7, 2023

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Supplemental Notice of Expert Witness has been served via electronic mail and electronic filing on the following:

Mary E. Crawley, AUSA  
Patrick J. Murray, AUSA

*/s/ Mark E. Cedrone, Esquire*  
Mark E. Cedrone, Esquire

Date: November 7, 2023